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**VIA ECF & FACSIMILE 212 805-7986**

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Centre Street  
New York, New York 10007

Re:     *Grant, et al. v. Warner Music Group Corp et al.*  
            No. 13 Civ. 4449 (PGG)  
            *Henry, et al. v. Warner Music Group Corp et al.*  
            No. 13 Civ. 5031 (PGG)

Dear Judge Gardephe,

This firm, along with Leeds Brown LLP, and Maurice Pianko, Esq. represent Plaintiffs in the above-referenced wage and hour actions. I write on behalf of all parties to inform the Court that the parties have engaged in extensive settlement negotiations, and reached an agreement on the basic parameters of a class-wide settlement, subject to working out additional terms of the settlement, and subject to documentation.

At this time the parties respectfully request that this Court adjourn the deadline for Plaintiffs to publish Court-authorized notice of this action pursuant to this Court's September 19, 2014 Order (see Dkt. 72), so that the parties may focus on finalizing the remaining terms of the settlement. The parties anticipate reaching a final resolution within the next 30 days, and anticipate filing a motion for preliminary approval of the settlement, or a status report apprising the Court of the status of the settlement, at that time.

Respectfully submitted,

/s/Lloyd R. Ambinder

cc:     Laura Sack, Esq. (via email)  
         Lyle Zuckerman, Esq. (via email)  
         Jeff Brown, Esq. (via email)  
         Maurice Pianko, Esq. (via email)